

April 27, 2017

## **BY ELECTRONIC FILING**

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Re: Biennial Review of Telecommunications Regulations CG Docket No. 16-124, EB

Docket No. 16-120, IB Docket No. 16-131, ET Docket No. 16-127, PS Docket No.

16-128, WT Docket No. 16-138, WC Docket No. 16-132

Dear Ms. Dortch:

On April 25, 2017, Hughes Network Systems, LLC ("Hughes") met with Commissioner Mignon Clyburn and wireless, international, and public safety advisor, Daudeline Meme, to discuss Hughes's proposals and concerns in the above-referenced proceeding. Hughes was represented by Pradman Kaul, President and CEO; Dean A. Manson, Executive Vice President, General Counsel, and Secretary; Paul Gaske, Executive Vice President, HNS North America; David Zatloukal, Executive Vice President, Products and Services; Jennifer A. Manner, Senior Vice President, Regulatory Affairs; and Jodi Goldberg, Associate Corporate Counsel, Regulatory Affairs.

In the meeting Hughes addressed the need to streamline the application process for authorizing the space and ground components of a new satellite network into a unified authorization process with an overarching five year milestone for placing both components of the network into operation. Hughes highlighted the incongruence in the current rules, which only permit individually licensed earth station authorizations to be obtained one year prior to the commencement of service, and which creates a two-step process for such licenses that is inconsistent with FCC licensing for terrestrial wireless operations. Hughes further discussed how this misalignment in the FCC's licensing rules leads to substantial uncertainty and risk for satellite operators, who design their networks around the location of individually licensed earth stations, and yet have no certainty that they will be able to site these earth stations in the required locations to support its satellite service.

Pursuant to the Commission's rules, this notice is being filed in the above-referenced dockets for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,

/s/ Jodi Goldberg

Jodi Goldberg Associate Corporate Counsel, Regulatory Affairs Hughes Network Systems, LLC 11717 Exploration Lane Germantown, MD 20876 (301) 428-7140

cc: Daudeline Meme